

Matter No 25  
Rural Areas  
12<sup>th</sup> July 2012  
Mrs V Bamford (4030337)  
(DLP Planning Ltd)

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## **SOUTH GLOUCESTERSHIRE CORE STRATEGY EXAMINATION**

### **PRE-HEARING STATEMENT**

#### **MATTER 25: RURAL AREAS POLICY CS34**

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***Issue 1: Is there any benefit in defining boundaries to villages either to encourage or limit future development?***

1. It is our case that it *is* beneficial to define boundaries to villages in order to provide a degree of certainty to both encourage future development and to set a limit to that future development over the plan period.
2. Those benefits, however, only arise in both these respects where boundaries are reviewed from time-to-time in parallel with a review of the development needs of those villages. Such a review is now over due.
3. There are 37 settlements in South Gloucestershire currently listed as having settlement boundaries defined on the Proposals Map outside the main urban area (north and east fringes of Bristol) and the towns of Yate/Chipping Sodbury and Thornbury.
4. The village development boundaries as they now stand were last reviewed in the context of the preparation of the Northavon Rural Areas Local Plan and the Kingswood Local Plan; both adopted in 1991 more than 20 years ago.
5. The approach set out at paragraph 4.27 of the CS (Ref: Visions, Strategic Objectives, and Strategy for Development) is essentially to continue with the current policies, at least for the period until 2016, which have restricted new development to infilling within these old settlement boundaries. Twenty one years on, these boundaries now appear to be quite tightly drawn. This overly restrictive approach, in our view, to the settlements in the rural areas finds further expression in Policy CS34 (5).
6. Paragraph 4.28 of the CS acknowledge that: *“sites will inevitably reduce over time with the prospect of communities stagnating or going into decline”* and says the Council’s preferred approach will be to support communities in preparing parish and neighbourhood plans and that any changes reflected in a ‘Sites and Places DPD’ would be implemented in the middle to latter stages of the CS plan-period.
7. It is clear, however, that the resources to support communities in preparing parish plans are severely limited. Moreover, we say that there is no support in the National Planning Policy Framework (NPPF) for not undertaking this review much earlier and no evidence to justify why any boundary adjustments that are logical and justified now should only deliver development in the

middle and latter stages of the CS plan-period. There is also a reference to “*other mechanisms being considered as appropriate and relevant*” though no indication as to what these might be.

8. We say that, by definition, over an above the limited opportunities to recycle previously developed land that have arisen in the villages over the last 21 years, other infill opportunities have been reducing over that period. The CS does nothing to set the necessary positive context within which a Parish/Neighbourhood Plan might be prepared in respect of responding to an objective assessment of the type and quantity of housing needed to sustain existing services and community facilities and maintain or enhance the vitality of a particular rural community.
9. In summary therefore, we support the continued deployment of ‘development boundaries’ in the rural areas, but would stress that the value of doing so will only be realised through an early review of those boundaries, driven by an objective assessment of the development needs of those individual villages over the plan period.

***Issue 2: Should greater emphasis be given to allocating more housing in the rural areas as suggested by some respondents?***

10. It is our case that the CS does not give sufficient emphasis to the national policy support and the benefits of sustaining thriving village communities in South Gloucestershire.
11. The NPPF (paragraph 17) sets out 12 core land-use planning principles that should underpin both plan-making and decision-taking. These include the need to:

*“take account of the different roles and character of different areas”*

and, *inter alia*,

*“recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities”.*

(emphasis added)

Paragraph 55 goes on to confirm that in order to:

*“Promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.”*

12. The Council’s Vision for the rural areas for 2026 and beyond (Ref: last paragraph of Vision), clearly takes account of the intrinsic *character* of the countryside and its settlements and the important role the rural areas will continue to play in contributing to the economy, biodiversity and heritage of the district. There is nothing in this statement, however, to support the view that the Council recognises the need to actively support rural communities through positively planning to meet local housing needs (market and affordable) and ensure that they continue to thrive up to 2026 and beyond.

13. We also say that the proposed distribution of development envisaged in the CS fails to sufficiently reflect the sustainability benefits of smaller scale, more readily delivered and more easily assimilated developments which meet local needs and help sustain and can potentially enhance, local services within the rural areas.
14. Policies CS15 and CS34 seek, first and foremost, to restrict new development to infill sites within the confines of the existing settlement limits of the 37 settlements in the rural areas which are currently identified on the Proposals Map with a 'settlement boundary'. We say this would clearly be too restrictive given the limited and ever reducing opportunities for such development.
15. This issue is put into perspective by Policy CS15 which indicates that provision will be made for *up to* 85 dwellings 2021/22 to 2026/27 (i.e. 17 dwellings per annum), to be provided in the "Rest of South Gloucestershire", shared between the urban areas of the towns of Yate/Chipping Sodbury and Thornbury, the 37 individually identified settlements with defined development boundaries, and any exceptional redevelopments or barn conversions outside those settlements. We say this is overly restrictive and would provide a completely inadequate context for positively reviewing settlement boundaries either through the Sites and Places DPD or for neighbourhood planning by individual parishes.
16. It is not until Paragraph 16.8 in the supporting text to CS Policy CS34 that there is any acknowledgement of the importance *"for rural areas to thrive by creating and maintaining sustainable, mixed and inclusive communities"*.
17. Targeted small scale development for housing in reasonably accessible village communities would clearly be appropriate if related to local need (market, affordable and specialist elderly accommodation). Charfield is just one such village. It has a population of 2,600 (approximately 1,000 households) and a range of local services including a Primary School and local shops and benefits from the location of a very large employment site within walking distance over the boundary in Stroud District. On any analysis, a proportionate share of the 17 dwellings per annum associated with the 'rest of South Gloucestershire' (Yate/Chipping Sodbury, Thornbury and 36 other villages of varying size) would be totally inadequate.
18. Even on a net-nil migration scenario (i.e. balance between in-migration and out-migration), many of these villages will need considerably more housing development over the period to 2027 than the very low levels envisaged in the context of Policies CS5, CS15 and CS34. Charfield's share of this new development would unequivocally not sustain existing population levels or the proportion of those living within the community being within an age range that would be economically active and would clearly not achieve the thriving communities envisaged, at least at Paragraph 16.8 and the sustainability objectives identified elsewhere in the Core Strategy.
19. In seeking to meet newly arising local housing need (affordable and market), it would be more sustainable to accommodate that which is and will continue to arise in and around the settlements where it arises. It is, moreover, considered that a marginally more dispersed distribution of development, in proportion with the scale and distribution of the rural settlements, rather than

an over reliance on large scale urban extensions, is supported by the sustainability appraisal insofar as making a more effective use of resources is concerned; i.e. sustaining existing services and facilities rather than generating requirements for completely new infrastructure as is the case with large urban extensions.

20. We say that, in order to meet the core planning principles expressed in the NPPF, a more realistic objectively assessed level of development, albeit still relatively modest by comparison with the overall total, is essential if communities are to thrive.

***Issue 3: Does the policy allow sufficient scope for the needs of local communities to be met including affordable housing or provision for the elderly?***

21. For the reasons explained above, we do not consider that Policy CS34 (in combination with Policy CS5 and CS15) provides a sufficiently positive foundation on which to base the Sites and Places DPD and Neighbourhood Plans.

***Issue 4: Is there too much emphasis on affordable/specialist housing in rural areas rather than market housing?***

22. We do not see any justification for placing undue emphasis on the provision of affordable or specialist housing to the exclusion of market housing. In an evidence-led plan-making system the emphasis should be on meeting objectively assessed housing needs (market, affordable and specialist).
23. The current rural exception policy which has operated since adoption of the South Gloucestershire Local Plan in 2006, does not appear to have delivered any affordable housing on 'exception' sites outside the boundaries of any of the rural settlements. It remains our contention that timely *delivery* of any affordable housing is more likely to be achieved in tandem with market housing on allocated sites (in effect adjustments to the settlement boundaries) which are acceptable to local communities and prove attractive to developers and landowners.

***Issue 5: Should a more positive approach be taken to allow brownfield sites in rural areas/green belt locations to be re-used?***

24. Not Addressed

***Issue 6: What role is envisaged for neighbourhood plans in bringing forward local development initiatives?***

25. Not Addressed.